



## CHARTER – CUSTOMER CONFIDENTIALITY

### Shareholder, Director & Management Commitment

Atlas Corp. (together with its subsidiary Seaspan Corporation and its shareholder Poseidon Corp., the “Atlas Group”) strives to be the global containership provider of choice, offering our customers and partners the best platform for successful and sustainable growth. At Atlas Group, we understand that a company is only as good as its people and as strong as its reputation. We outperform competitors by providing consistently safe, reliable, and economical operations. Central to our ability to deliver is our dedication and loyalty to our customers. Throughout our operations and growth, we have resolutely protected the confidential customer information and data that are entrusted to our commercial and technical management staff. With the full commitment of its shareholders and constituent companies, Atlas Group has enacted these Principles of Customer Confidentiality, which provides a formal framework to secure any sensitive customer information accessible only by relevant Atlas Group individuals.

### Key Principles – Atlas Group, Management and Employees

**Principle 1.** Access to information deemed by Atlas to be sensitive confidential customer information (“Information”) is restricted to relevant operational & business unit level personnel.

**Principle 2.** Atlas Group Directors may access Information if required to carry out their fiduciary duties but on an as-needed and segregated basis using “clean room” document review process controls.

**Principle 3.** Where appropriate, Directors shall be required to sign a Confidentiality Agreement incorporating these Principles restricting Information sharing with non-Atlas Group parties.

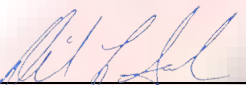
**Principle 4.** Atlas Group shall train staff to ensure effective Information access restrictions.

**Principle 5.** Internal Audit shall audit the procedures and processes to ensure Charter compliance.

### Approval and review of this Charter

On an annual basis, the Compensation and Governance Committee shall review this charter and recommend to the Board of Directors any modifications, for approval by the Board.

This charter is approved by the Board of Directors and signed on their behalf by:

  
\_\_\_\_\_  
Chair of the Board

  
\_\_\_\_\_  
Chair – Compensation & Governance Committee